

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

OTIS ELEVATOR COMPANY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 08 C 1107
)	
EMERSON ELECTRIC COMPANY d/b/a)	
U.S. ELECTRICAL MOTORS, INC.)	Hon. Ronald A. Guzman
)	Magistrate Judge Sidney I. Schenkier
-and-)	
)	
CHAMPLAIN CABLE CORPORATION)	
)	
Defendants.)	

**DEFENDANT CHAMPLAIN CABLE CORPORATION'S
AGREED MOTION FOR AN EXTENSION OF TIME IN WHICH
TO ANSWER OR OTHERWISE PLEAD**

Defendant Champlain Cable Corporation ("Champlain"), by and through its attorneys, Schopf & Weiss LLP, hereby files its Agreed Motion for an Extension of Time in Which to Answer or Otherwise Plead to Plaintiff Otis Elevator Company's Complaint, pursuant to Rule 6(b)(1)(a) of the Federal Rules of Civil Procedure. In support of this motion, Champlain states the following:

1. Champlain requests a three-week extension of time to June 9, 2008, to answer or otherwise plead to Plaintiff's complaint.
2. Champlain only recently obtained counsel and is still in the process of its initial investigation of the facts in this matter.

3. Toward that end, the parties have arranged to confer over this matter in early June with the hope of either advancing the resolution of this dispute or streamlining the issues.

4. An extension of time would assist Champlain to both explore the underlying facts in this matter and present its defenses in a more effective manner.

5. Champlain does not seek this extension for purposes of delay or for any other improper purpose.

6. No party will be prejudiced by this motion.

7. Plaintiff has agreed to this request.

WHEREFORE, Champlain respectfully requests that the Court grant this Motion and extend the time in which Champlain can file its response to Plaintiff's Complaint to June 9, 2008.

Dated: May 19, 2008

Respectfully submitted,

/s/ Patrick J. Heneghan

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Admission *Pro Hac Vice* to be sought

CERTIFICATE OF SERVICE

I, Patrick J. Heneghan, an attorney, certify that the foregoing **Defendant Champlain Cable Corporation's Agreed Motion For An Extension of Time in Which to Answer or Otherwise Plead** was filed electronically with the Clerk of the Court using the CM/ECF system on this 19th day of May, 2008, which will automatically send email notifications of such filing to the following:

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